5HE-12

Mr. Robert T. Pyle, P.E.
Conestoga-Rovers & Associates Limited
651 Colby Drive
Waterloo, Ontario, Canada N2v IC2

Re: Former P.R. Mallory Plant Site
Phase I - Supplemental Soil Sampling Program

Dear Mr. Pyle:

The following comments are made pursuant to IDEM's and U.S. EPA's review, of the above referenced document.

1. Additional background samples should be added to the supplemental program. A minimum of 2 samples should be taken south of State Road 32; west of the residence. An additional background sample should be taken from the field east-northeast of the ravine. These samples should be analyzed for PCBs and dioxin/furans.

2. Additional samples should be taken between sampling stations 500 and 501; and 501 and 145. It may be beneficial to collect additional "upstream" samples in the ravine while mobilized. The additional samples need be analyzed only if upstream samples have levels of PCBs less than 1 ppm.

   Surface water samples should be collected from the same locations in the ravine where the sediment samples are taken (if possible). Based on analytical results from the ravine area, the fence may have to be extended.

3. Clarify when additional sampling will take place under the area covered with the synthetic liner.

4. The analytical and QA/QC procedures to be utilized in the supplemental sampling phase should be clarified. Strict adherence to CLP analytical and QA/QC protocols is not necessary for this phase of the project.

5. Additional surface water samples should be collected and analyzed from the ravine and the drainage pipes discharging to the ravine. The detection limits for PCBs should be .1 ug/l. (ATSDR has stated that levels of PCBs in water greater than .9 ug/l may pose a threat to human health).

   These samples should be collected as soon as possible. Based on the results of the surface water samples, treatment of the water flowing through the ravine may be necessary prior to its discharge to Little Sugar Creek.

6. The drainage pipes discharging to the ravine should be traced and properly adandoned. If the pipes are not properly adandoned, a discharge permit may be required.

7. The on-site water supply well should be investigated to determine the level of effort required to collect water samples and levels and determine the integrity of the well.

8. The water supply wells for Terra-Products and Superior Moving should be included in the next round of groundwater sampling. These samples should be analyzed for PCBs and VOCs.

9. Grain-size analysis should be performed on sediment samples from Little Sugar Creek.

10. Measurement of the flow through the ravine should be performed.

11. Additional air samples should be taken around the perimeter of the site to determine if there is any significant migration of PCBs through the air.

These comments have been relayed to you during telephone conversations of April 28 and 30, 1987 among Gretta Hawvermale, (IDEM), you and me. Based on these discussions IDEM and U.S. EPA agreed the Supplemental Soil Sampling program could be initiated on May 4, 1987.

Additional comments will be provided on the Phase I Sampling and Analysis Report and the Hydrogeological Investigation Interim Report.

Sincerely,

David Favero
Remedial Project Manager

bcc: Bill Simes, 5HR-11
Mark Radell, 5CS-16